California Regional Water Quality Control Board
San Diego Region

Winston H. Hickox
Secretary for Environmental Protection

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Gray Davis
Governor

ITEM No. 6
SUP. DOC. 4

November 6, 2002

Mr. Gary Arant
General Manager
Valley Center Municipal Water District
P.O. Box 67
Valley Center, CA 92082

In Reply Refer To:
01-0928.02

Dear Mr. Arant:

STAFF RESPONSES TO COMMENTS AND ERRATA SHEET FOR TENTATIVE ORDER NO. R9-2002-0336, MASTER RECLAMATION PERMIT WITH WASTE DISCHARGE REQUIREMENTS FOR THE PRODUCTION AND PURVEYANCE OF RECYCLED WATER FOR ORCHARD RUN WATER RECLAMATION FACILITY, VALLEY CENTER MUNICIPAL WATER DISTRICT, VALLEY CENTER, SAN DIEGO COUNTY

Enclosed is a copy of staff's responses to comments received regarding Tentative Order No. R9-2002-0336. The comments were received in a letter dated November 1, 2002 from Fuog Water Resources, the consulting firm which prepared the Report of Waste Discharge for the project. Thus far, these are the only comments received concerning the Tentative Order.

Also enclosed is an errata sheet containing proposed revisions to the Tentative Order in response to some of the comments received and additions and clarifications from staff. Staff will present its responses and the errata sheet to the Regional Board for consideration prior to the Regional Board meeting scheduled for November 13, 2002. Staff believes that the revisions are minor and have no impact on the intent of the Order; consequently, the Tentative Order is expected to remain on the consent calendar for the Regional Board meeting.

If you have any questions or comments, please contact Mr. Victor Vasquez at (858) 636-3155, email vasqv@rb9.swrcb.ca.gov.

Sincerely,

JOHN H. ROBERTUS
Executive Officer

Enclosures:
1. Regional Board staff responses to comments from interested parties
2. Letter dated November 1, 2002 from Fuog Water Resources
3. Errata sheet containing proposed revisions to Tentative Order No. R9-2002-0336.

Cc: Wally Grabbe
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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

ITEM NO. 6
TENTATIVE ORDER NO. R9-2002-0336
RESPONSES TO COMMENTS FROM INTERESTED PARTIES

Page	Comment	Staff Response to Comment
COMMENTS ON TENTATIVE ORDER NO. R9-2002-0336 AND MONITORING AND REPORTING PROGRAM		
8	Discharge Specifications, Section B, Item 3: "the references made to 60304(b) and 60320.5 are questioned. I believe it should be 60304(a) and I am not sure why 60320.5."	The reference to Section 60304 (b) of California Code of Regulations, Title 22, Division 4, Chapter 3 (Water Recycling Criteria) has been corrected to indicate Section 60304(a) which applies to the intended use of recycled water for landscape irrigation for this project. (See Errata Sheet Item No. 2) The reference to Section 60320.5, which applies to other methods of treatment that would be allowed but not specified in the Water Recycling Criteria, is retained because it is relevant to water recycling projects in general.
8 and 32	Effluent Monitoring, Section B, Item2: "I question the requirement for monthly monitoring of volatile solids in the effluent, especially since there is no effluent requirement."	The volatile suspended solids content in the effluent is an approximation of the organic matter content of the effluent and is an indicator of the perfomance of the treatment plant's sedimentation and biological treatment processes. Staff believes this is a useful parameter to monitor even without a corresponding effluent limitation.

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Page	Comment	Staff Response to Comment
COMMENTS ON TENTATIVE ORDER NO. R9-2002-0336 AND MONITORING AND REPORTING PROGRAM		
32	Effluent Monitoring, Section B, Item 2, Chlorine Residual: "I believe the chlorine residual is unnecessary and should be deleted, at the CT value, incorrectly labeled "chlorine contact time" already includes the chlorine residual in its calculations. Should you decided [sic] to leave the chlorine residual in the permit requirement, please clarify the permit to show if it is either Free Chlorine or Total Chlorine that should be monitored."	Although it may seem redundant, the monitoring and reporting for chlorine residual is necessary in order for staff to verify the calculated CT values. The CT value is the product of the chlorine residual concentration multiplied by the modal contact time. In the table under Section B, Item 2 on page 32, the term "Chlorine Contact Time" is changed to "CT" and the term "Chlorine Residual" is clarified to "Total Chlorine Residual." (See Errata Sheet Item No. 4)
36	Effluent Monitoring, Section B, Item **. "As indicated this is a calculated value. The following statement 'determined and recorder [sic] continuously' appears to be in conflict. To my understanding and research, there is no instrument that automatically calculates this value. The reference to continuously recorded should be removed."	Since chlorine residual and flow rate (modal contact time is determined from flow rates) can be continuously determined and recorded, the CT value can also be "determined and recorded continuously" as the product of chlorine residual concentration and the modal contact time. Staff concluded that it is not necessary to delete the statement "continuously recorded." The Note indicated by ** on page 36 has been modified to provide further guidance on CT value reporting requirements. (See Errata Sheet Item No. 5)

FUOG WATER RESOURCES INC.

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SAN DIEGO REGION
WATER QUALITY
CONTROL BOARD

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November 1, 2002

California Regional Water Quality Control Board
San Diego Region
9174 Sky park Court, Suite 100
San Diego, CA. 92123

RE: Draft Permit R9-2002-0336 (Orchard Run)

Gentlemen,
I have reviewed the draft discharge permit and found it consistent with the RWD. I have discovered a few minor changes that should be corrected. They are as follows:

1) p. 8 Permit:, item 3: the references made to 60304(b) and 60320.5 are questioned. I believe it should be 60304(a) and I am not sure why 60320.5 is included.

2) p.8 Monitoring: I question the requirement for monthly monitoring of volatile solids in the effluent, especially since there is no effluent requirement.

3) p32 Monitoring; Item B2, chlorine residual. I believe the chlorine residual is unnecessary and should be deleted, as the CT value, incorrectly labeled "chlorine contact time" already includes the chlorine residual in its calculations. Should you decided to leave the chlorine residual in the permit requirement, please clarify the permit to show if it is either Free Chlorine or Total Chlorine that should be monitored.

4) p36 monitoring: item **: As indicated this is a calculated value. The following statement "determined and recorder continuously" appears to be in conflict. To my understanding and research, there is no instrument that automatically calculates this value. The reference to continuously recorded should be removed.

We trust that these minor items have no impact on the content of the permit and allows for the draft permit to remain on the consent calendar.

If you have any questions, do not hesitate to call me at (408) 259-3885.

Very truly yours

René M. Fuog
Engineer for Developer

e-mail: John Belanich, Developer
Wally Grabbe, VCMWD

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ERRATA SHEET

ITEM NO. 6

NOVEMBER 13, 2002

TENTATIVE ORDER NO. R9-2002-0336

The following revisions have been made to Tentative Order No. R9-2002-0336. Text to be added is underlined and text to be deleted is indicated by ~~strikeout~~.

TENTATIVE ORDER

1. **Page 2, Findings, Item 3**

   The RWD contains a conceptual process schematic of the proposed ORWRF~~, describing t~~The wastewater treatment scheme at ORWRF~~facility~~ is described as consisting of pre-treatment by comminution, secondary treatment by an activated sludge process, tertiary treatment by coagulation, flocculation, and filtration, and disinfection with sodium hypochlorite.~~, flow equalization, s~~ Biosolids from the wastewater treatment scheme will be further treated by aerobic digestion and dewatering.~~, and~~ ORWRF will also include odor control processes and a stand-by power supply.

2. **Page 8, Discharge Specifications, Section B, Item3**

   Effluent used for landscape irrigation purposes shall be treated to the most restricted level in conformance with all applicable provisions of California Code of Regulations, Title 22, Division 4, Chapter 3 (Water Recycling Criteria) for landscaping irrigation [currently sections 60304 (~~b~~a) and 60320.5].

3. **Page 27, Attachment No. 1, Item 21**

   All use areas where recycled water is used and that are accessible to the public shall be posted with conspicuous signs, in a size no less than 4 inches by 8 inches, that include the following wording and picture in a size no less than 4 inches high by 8 inches wide: "RECYCLED WATER - DO NOT DRINK". See Attachment No. 2 for the acceptable symbol. The sign(s) shall be of a size easily readable by the public. The prescribed wording should also be translated into Spanish and other appropriate languages and included in the required signs.

TENTATIVE MONITORING AND REPORTING PROGRAM

4. Page 32, Effluent Monitoring, Section B, Item 2

CONSTITUENT	UNIT	TYPE OF SAMPLE	SAMPLING FREQUENCY[2,3]	REPORTING FREQUENCY
Flowrate[1]	Gallons/Day	Continuous	Continuous	Monthly
Turbidity	NTU	Continuous	*	Monthly
CT[4] ~~Chlorine Contact Time~~[4]	mg-min/L	Calculated	**	Monthly
Total Chlorine Residual[4]	mg/L	Continuous	***	Monthly
Total Coliform	MPN/100ml	Grab	****	Monthly
Biochemical Oxygen Demand (BOD_5 @ 20°C)	mg/L	Composite	Monthly	Monthly
Total Suspended Solids	mg/L	Composite	Monthly	Monthly
Volatile Suspended Solids	mg/L	Composite	Monthly	Monthly
pH	Unit	Grab	Monthly	Monthly
Total Dissolved Solids	mg/L	Composite	Annually	Annually
Chloride	mg/L	Composite	Annually	Annually
Nitrate as NO_3	mg/L	Composite	Annually	Annually
Sulfate	mg/L	Composite	Annually	Annually
Boron	mg/L	Composite	Annually	Annually

5. Page 36, Effluent Monitoring, Section B, Notes

** Calculated CT (chlorine concentration multiplied by modal contact time) values shall be determined and recorded continuously. Continuously shall mean consecutively and at intervals not greater than 15 minutes. The daily minimum CT value shall be reported monthly. The discharger shall report monthly the date(s), ~~value(s)~~, time(s), ~~and~~ duration, instantaneous CT value(s), instantaneous flow rates and instantaneous total chlorine residuals when the CT value(s) falls below 450 mg-min/L, and/or the modal contact time falls below 90 minutes.